

1 Yvette Davis (Bar No. 165777)  
yDavis@hbblaw.com  
2 Arezoo Jamshidi (Bar No. 284220)  
ajamshidi@hbblaw.com  
3 Jeffrey Kirwin (Bar No. 345781)  
jkirwin@hbblaw.com  
4 HAIGHT BROWN & BONESTEEL LLP  
edocs@hbblaw.com  
5 2030 Main Street, Suite 1525  
Irvine, California 92614  
6 Telephone: 714.426.4600  
Facsimile: 714.754.0826

7  
8 Attorneys for Defendants THE GUILD LAW SCHOOL DBA  
PEOPLE'S COLLEGE OF LAW, JOSHUA GILLENS,  
WILLIAM MAESTAS, BOARD OF DIRECTORS FOR THE  
9 PEOPLE'S COLLEGE OF LAW, CHRISTINA MARIN  
GONZALEZ; ROGER ARAMAYO; ISMAIL VENEGAS;  
10 CLEMENTE FRANCO; HECTOR PENA; PASCUAL  
TORRES; CAROL DEUPREE; JESSICA VIRAMONTES;  
11 AND JUAN SARINANA

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

14  
15 TODD R. G. HILL,  
16 Plaintiff,

17 v.

18 THE BOARD OF DIRECTORS,  
OFFICERS AND AGENTS AND  
19 INDIVIDUALS OF THE PEOPLES  
COLLEGE OF LAW; et al.

20 Defendants.  
21  
22

Case No. 2:23-CV-01298-JLS-BFM

**DEFENDANTS' OPPOSITION TO  
PLAINTIFF'S MOTION FOR LEAVE  
TO AMEND HIS THIRD AMENDED  
COMPLAINT; AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES**

**COURT WILL TAKE UNDER  
SUBMISSION WITHOUT ORAL  
ARGUMENT**

Judge Hon. Josephine L. Staton

Magistrate Judge Hon. Brianna Fuller  
Mircheff

23  
24  
25 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR  
26 COUNSEL OF RECORD:

27 COMES NOW the Defendants THE GUILD LAW SCHOOL DBA PEOPLE'S  
28 COLLEGE OF LAW, JOSHUA GILLENS, WILLIAM MAESTAS, BOARD OF

Haight

DIRECTORS FOR THE PEOPLE’S COLLEGE OF LAW, CHRISTINA MARIN GONZALEZ, ROGER ARAMAYO, ISMAIL VENEGAS,; CLEMENTE FRANCO, HECTOR PENA, PASCUAL TORRES, CAROL DEUPREE, JESSICA VIRAMONTES, AND JUAN SARINANA (hereinafter collectively referred to as “Defendants”) submit the following Opposition to Plaintiff’s Motion for Leave to Amend his Third Amended Complaint, Memorandum of Points and Authorities in Support of Opposition to Plaintiff’s Motion for Leave to Amend his Third Amended Complaint.

DATED: September 30, 2024

HAIGHT BROWN & BONESTEEL LLP

By: /s/ Arezoo Jamshidi

Yvette Davis

Arezoo Jamshidi

Jeffrey Kirwin

Attorneys for Defendants THE GUILD

LAW SCHOOL DBA PEOPLE’S

COLLEGE OF LAW, JOSHUA

GILLENS, WILLIAM MAESTAS,

BOARD OF DIRECTORS FOR THE  
PEOPLE’S COLLEGE OF LAW,

CHRISTINA MARIN GONZALEZ;

ROGER ARAMAYO; ISMAIL

VENEGAS; CLEMENTE FRANCO;

HECTOR PENA; PASCUAL TORRES;

CAROL DEUPREE; JESSICA

VIRAMONTES; AND JUAN SARIANA

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Plaintiff Todd Hill (“Plaintiff”) seeks to move this Court to file yet another amended complaint—his sixth attempt at filing a viable pleading. This Court gave Plaintiff leave to file a Third Amended Complaint—not a Fourth Amended Complaint. His Third Amended Complaint failed to follow this Court’s instructions. Plaintiff did not correct the numerous deficiencies from this Second Amended Complaint and even added claims in the Third Amended Complaint that were not previously alleged. This clearly violated this Court’s order that only allowed Plaintiff to file a Third Amended Complaint to correct the deficiencies outlined in the Court order—not add new claims.

Defendants (including defendant Ira Spiro and the State Bar Defendants) had extensive meet and confer efforts with Plaintiff regarding the numerous deficiencies of his Third Amended Complaint. After these meet and confer efforts, Plaintiff moved this Court to file a “Amended Third Amended Complaint.” The Court should deny Plaintiff’s motion for numerous reasons.

First, Plaintiff failed to comply with Local Rule 7-3. Plaintiff did not meet and confer with Defendants nor did he provide a reason as to why Local Rule 7-3 does not apply here.

Second, Plaintiff’s motion contains conclusory statements without analysis or explanation as to why he is entitled to file a Fourth Amended Complaint.

Third, in light of the extensive work entailed in reviewing Plaintiff’s extremely verbose and often confusing Third Amended Complaint, Defendants are faced with another equally long and confusing “Amended Third Amended Complaint.” The continuous litigation expenses in having to review, decipher, analyze and formulate a response to each of Plaintiff’s complaints are extensive and prejudicial.

Fourth, the Court should not grant another amendment where it would be futile. The “Amended Third Amended Complaint” contains many of the same issues the

Haight

1 Second Amended and Third Amended Complaint contained. Moreover, Plaintiff  
2 includes claims that he had previously waived. Simply put, the proposed amended  
3 complaint is riddled with deficiencies, ones that Plaintiff has had numerous  
4 opportunities to cure.

5 Based on the foregoing reasons, the Court should deny Plaintiff's Motion to  
6 Amend.

7 **II. PROCEDURAL BACKGROUND**

8 On February 20, 2023, Plaintiff filed his initial Complaint. [Dkt. No. 1.] On  
9 April 5, 2023, the Court issued an order, on its own motion, dismissing the Complaint  
10 for violation of F.R.C.P. 8(a) and (d), with leave to amend. [Dkt No. 37.] The order  
11 explains in detail why the Complaint was improper, how it violated the Federal Rules,  
12 and why it must be dismissed. On April 18, 2023, Plaintiff filed a First Amended  
13 Complaint. [Dkt. No. 38.]

14 On May 5, 2023, Plaintiff filed a document entitled "A Motion for Leave to  
15 Supplement Todd R. G. Hill's First Amended Complaint," and attached a proposed  
16 "Supplemental First Amended Complaint." [Dkt. No. 40.] The "Supplemental First  
17 Amended Complaint" was 114 pages, with no exhibits, but referred to the same  
18 exhibits as the First Amended Complaint. [Dkt. No. 40.]

19 On June 7, 2023, the Court issued an order that denied Plaintiff's Motion for  
20 Leave to Supplement the First Amended Complaint and dismissed the First Amended  
21 Complaint with leave to amend. [Dkt. No. 45.] The order explains in detail why the  
22 First Amended Complaint was improper, how it violated the Federal Rules of Civil  
23 Procedure and this Court's Local Rules, and why it must be dismissed. The last  
24 paragraph of the order paragraph reads:

25 If Hill still wishes to pursue this action, **he is granted**  
26 **twenty-one (21) days from the date of this Order to file**  
27 **a Second Amended Complaint, attempting to cure the**  
28 **defects in the Complaint described herein. The Second**  
**Amended Complaint must be complete in itself and not**  
**refer in any manner to the FAC or the original**  
**Complaint. The Second Amended Complaint should**

1 contain a “short and plain statement” of the claim or  
2 claims for relief, setting forth, in straightforward  
3 fashion, the facts supporting each claim. See Fed. R. Civ.  
4 P. 8(a), (d)(1). All allegations should be made in  
(correctly) numbered paragraphs. See Fed. R. Civ. P.  
10(b).

5 (Emphasis added.)

6 Plaintiff failed to file a Second Amended Complaint within 21 days of the  
7 Court’s order. On July 27, 2023, the Court issued a Judgment of Dismissal for failure  
8 to file a Second Amended Complaint within the 21 days allotted. [Dkt. No. 47.]

9 Over a month later, on September 7, 2023, Plaintiff did the following:

10 1. Filed a “Motion for Leave to File a Second Amended Complaint and to Set  
11 Aside Judgment of Dismissal” [Dkt. No. 48]; and

12 2. Filed a Second Amended Complaint, even though Plaintiff’s Motion for  
13 Leave to File a Second Amended Complaint had not been granted or even ruled on,  
14 and the Judgment of Dismissal had not been set aside. [Dkt. No. 49.]

15 On September 18, 2023, the Court issued an order striking the Second  
16 Amended Complaint. [Dkt. No. 51.] In addition, the Court issued an order granting  
17 Plaintiff’s motion to set aside the dismissal and ordering Plaintiff to file an amended  
18 complaint within 14 days of the order. [Dkt. No. 54.] Two days later, on September  
19 20, 2023, Plaintiff filed the SAC. [Dkt. No. 55.]

20 On April 23, 2024, Magistrate Judge Brianna Fuller Mircheff filed an Interim  
21 Report and Recommendation of United States Magistrate Judge (the, “Report”). The  
22 Report recommended Plaintiff’s Second Amended Complaint be dismissed. Notably,  
23 the Magistrate Judge recommended the SAC be dismissed because it failed to comply  
24 with FRCP 8. The Report explained:

25 The 121-page SAC, like the First Amended Complaint (see  
26 ECF 45 at 8-9 (discussing same)), is excessively long and  
27 often confusing. Indeed, the SAC is almost fifty pages  
28 *longer* than the First Amended Complaint – a complaint that  
the District Judge described as excessively prolix. Moreover, despite the District Judge’s prior warnings, the  
SAC continues to exhibit the landmarks of a “shotgun

Haight

pleading.” The Court thus agrees with Defendants that dismissal under Rule 8 is once again appropriate.

On August 12, 2024, this Court accepted the Report and Recommendation filed by Magistrate Judge Brianna Fuller Mircheff. The Court ordered the following: (1) dismissed the Second Amended Complaint in its entirety for failure to comply with Rule 8; (2) dismissed with prejudice all of Plaintiff’s claims against the State Bar and its committees or departments because these Defendants have Eleventh Amendment immunity (except for Plaintiff’s Twelfth and Thirteenth Causes of Action based only on Title IX); (3) dismissed with prejudice all of Plaintiff’s claims against the individual State Bar Defendants in their official capacity (except Plaintiff’s Twelfth and Thirteenth Causes of Action based only on Title IX and Sixth and Seventh Causes of Action to the extent those claims may seek declaratory or injunctive relief); (4) dismissed with prejudice Plaintiff’s Sixth Cause of Action to the extent it seeks Federal Bar admission; (5) dismissed with prejudice Plaintiff’s Fourteenth, Fifteenth and Sixteenth Cause of Action under 18 U.S.C. §§ 241, 242 and 245 because there is no private right of action under those statutes; and (6) dismissed with prejudice Defendants office of Chief Trial Counsel, Board of Trustees, Office of Admissions and Office of General Counsel. [Dkt. No. 145.]

On August 21, 2024, Plaintiff filed his Third Amended Complaint, but it was not served on Defendants until August 26, 2024. [Dkt. No. 148.] On September 4, Defendant Ira Spiro filed his motion to dismiss the Third Amended Complaint and an amended motion the next day. [Dkt. Nos. 152, 154.]

On September 6, 2024, Plaintiff filed a motion to amend his Third Amended Complaint. [Dkt. 163.]

On September 9, 2024, Defendants filed their motion to dismiss the Third Amended Complaint, which the Court struck for procedural deficiencies. [Dkt. 159, 162.] Defendants refiled their motion on September 12, 2024. [Dkt. No. 165.] The



1 State Bar Defendants filed their motion to dismiss Plaintiff's Third Amended  
2 Complaint on September 23, 2024. [Dkt. No. 172.]

3 **III. ARGUMENT**

4 **A. Plaintiff Failed to Comply with Local Rule 7-3.**

5 Ironically, despite Plaintiff's countless claims that Defendants failed to comply  
6 with Local Rule 7-3, Plaintiff did not even attempt to meet and confer with Defendants  
7 on his motion to amend. There is no declaration of compliance attached to Plaintiff's  
8 motion. Plaintiff does not even provide an argument as why Local Rule 7-3 does not  
9 apply. On this basis alone, the motion should be denied.

10 **B. Federal Rule of Civil Procedure 15(a) Does Not Provide Authority**  
11 **to Plaintiff to Amend His Complaint.**

12 Plaintiff relies solely on Federal Rule of Civil Procedure section 15(a) to  
13 support the filing of his "Amended Third Amended Complaint." According to  
14 Plaintiff, "[t]he Rule provides that the movant can file amendments freely up to 21  
15 days from the date of filing." [Motion, p. 3:10-11.] Plaintiff's reliance on this rule is  
16 misplaced.

17 Under Federal Rule of Civil Procedure 15, a plaintiff may amend the complaint  
18 once as a matter of course within "(A) 21 days after serving it, or (B) if the pleading  
19 is one to which a responsive pleading is required, 21 days after service of a responsive  
20 pleading or 21 days after service of a motion under Rule 12(b), (e), or (f), whichever  
21 is earlier." Fed.R.Civ.P. 15(a)(1). "In all other cases, a party may amend its pleading  
22 only with the opposing party's written consent or the court's leave." Fed.R.Civ.P.  
23 15(a)(2).

24 Plaintiff indicates that he is amending "as a matter of course." [Dkt. No. 163.]  
25 However, Plaintiff already amended the complaint, not once but four times. The Rule  
26 governing amended and supplemental pleadings only allows a party to amend its  
27 pleading once as a matter of course, rather than once for each time any opposing party  
28 files a responsive pleading or a motion to dismiss. *Wilson v. Ortega*, No. 2:21-cv-

0314 KJM AC P, at \*1-2 (E.D. Cal. Jan. 20, 2023); see also *Zayas v. Messit*, No. C20-0747-JCC, 2021 WL 3675033, at \*2 (W.D. Wash. Aug. 19, 2021) (“Plaintiff exhausted her one-time right to amend as a matter of course when she filed her first amended complaint”); *United States ex rel. D’Agostino v. EV3, Inc.*, 802 F.3d 188, 193 (1st Cir. 2015) (the time to amend begins when plaintiff files his complaint, “the word ‘within’ merely specifies the point at which the right expires”). Since Plaintiff has already amended once as a matter of course, he must first obtain Defendants’ consent or leave of the court before amending again.

C. **This Court Should Deny Plaintiff’s Leave to Amend Where Defendants Will Be Prejudice and Where Amendment Would Be Futile.**

Despite relying on Rule 15(a), Plaintiff seeks leave from this Court to amend his Third Amended Complaint. Oddly, Plaintiff renames his pleading as an “Amended Third Amended Complaint” when it should be correctly referred to as his Fourth Amended Complaint. Regardless, Plaintiff sets forth conclusory arguments as to why this Court should grant leave to amend, none of which have merit.

“In determining whether leave to amend is appropriate, the district court considers ‘the presence of any of four factors: bad faith, undue delay, prejudice to the opposing party, and/or futility.’” *Owens v. Kaiser Found. Health Plan, Inc.*, 244 F.3d 708, 712 (9th Cir. 2001) (additional citation omitted).

“Prejudice is the touchstone of the inquiry under rule 15(a).” *Eminence Capital, LLC v. Aspeon, Inc.*, 316 F.3d 1048, 1052 (9th Cir. 2003) (internal quotes omitted). A district court’s discretion is “‘particularly broad’ where the plaintiff has previously amended.” *Salameh v. Tarsadia Hotel*, 726 F.3d 1124, 1133 (9th Cir. 2013) (plaintiff had “ample opportunity to properly plead a case”). The fact that the pleader failed to take advantage of previous opportunities to amend, without explanation, may also be ground for denying leave to amend. *Jang v. Boston Scientific Scimed, Inc.*, 729 F.3d



Haight

1 357, 368 (3rd Cir. 2013) (“This court has declined to reward a wait-and-see approach  
2 to pleading”).

3 Here, Plaintiff claims in a conclusory fashion that “[t]he proposed amendment  
4 will not prejudice the existing defendants. The new defendants are connected to the  
5 same set of facts and events already detailed in the TAC.” [Dkt. No. 163, p. 3.] This  
6 is simply untrue.

7 The Court granted the dismissal of Plaintiff’s Second Amended Complaint with  
8 leave to amend to allow Plaintiff to cure the deficiencies outlined in the Court’s order.  
9 Plaintiff filed his Third Amended Complaint, but failed to cure the deficiencies from  
10 his Second Amended Complaint. In fact, Plaintiff created even more deficiencies.  
11 Even worse, Plaintiff improperly included claims not previously alleged in the Second  
12 Amended Complaint. Simply put, Plaintiff did not take advantage of the opportunity  
13 to file a viable Third Amended Complaint despite the Court’s clear instructions on  
14 correcting the deficiencies. Plaintiff defiantly ignored these instructions and should  
15 not be rewarded with yet another (fifth) opportunity to amend his complaint.

16 Defendants, including defendant Ira Spiro and the State Bar Defendants have  
17 all filed motions to dismiss Plaintiff’s Third Amended Complaint. Each set of  
18 Defendants spent considerable time meeting and conferring with Plaintiff as well as  
19 analyzing Plaintiff’s Third Amended Complaint to determine the viability of each  
20 claim alleged, including the new claims not previously alleged. This is at considerable  
21 expense to the Defendants, who have already gone through several iterations of  
22 Plaintiff’s complaint. These complaints have been excessively long and often  
23 confusing, which required a tremendous amount of time to analyze in order to provide  
24 a response. These substantial litigation expenses are prejudicial to Defendants. *Owens*  
25 *v. Kaiser Found. Health Plan, Inc.*, 244 F.3d 708, 712 (9th Cir. 2001).

26 In addition to prejudice against Defendants, leave to amend may be denied if  
27 the proposed amendment is futile or would be subject to dismissal. *Carrico v. City &*  
28 *County of San Francisco*, 656 F.3d 1002, 1008 (9th Cir. 2011). Despite the numerous

Haight

1 opportunities this Court has provided Plaintiff, his proposed “Amended Third  
2 Amended Complaint” does not correct the many deficiencies outlined by the Court  
3 nor the deficiencies outlined by Defendants. Leave to amend will be futile.

4 For example, there is still nothing short and concise about the proposed  
5 “Amended Third Amended Complaint.” In fact, it is longer and contains more  
6 paragraphs than the Third Amended Complaint. This is despite the fact that the  
7 proposed complaint contains misnumbered paragraphs (see Dkt. No. 164, at p. 32.).

8 Plaintiff’s proposed amended complaint continues to use the “shotgun  
9 pleading” style that the Court criticized in its denial of Plaintiff’s request to  
10 supplement the First Amended Complaint. [Dkt. No. 45, p. 5-6.] For example,  
11 Plaintiff asserts causes of action against individual defendants, but fails specify  
12 allegations about what those individuals did. Plaintiff’s causes of action incorporate  
13 by reference several prior paragraphs in the Amended Third Amended Complaint,  
14 often stating “with particular emphasis” on stated allegations in a select list of  
15 paragraphs. However, the referenced paragraphs are confusing and do not align with  
16 the allegations.

17 Further, many of the individual defendants do not appear in any allegation  
18 despite the initial paragraphs identifying them. The caption lists other defendants (e.g.  
19 Viramontes) who are not identified as a defendant at all. In the proposed amended  
20 complaint, Plaintiff attempts to define “Board of Directors”, “Officers” or “Agents of  
21 the Peoples College of Law.” However, the definitions are unhelpful and create more  
22 confusion. Plaintiff fails to specify the individuals that are included in these groups  
23 and only provides a broad definition (i.e., “‘Board of Directors’ refers to the  
24 governing body of the Peoples College of Law, responsible for overall management  
25 and strategic decision.”). This definition is unhelpful as Plaintiff still refers to  
26 individual defendants being sued in their individual capacity (see e.g., Dkt. No. 164,  
27 ¶ 175). As such, Defendants are still left guessing who is included in these groups.

Haight

1 Ultimately, Plaintiff still has not cured the many deficiencies outlined by this  
2 Court and in lengthy meet and confer efforts by Defendants. Plaintiff's proposed  
3 "Amended Third Amended Complaint" is undoubtedly subject to a motion to dismiss  
4 and therefore, the Court should not grant yet another opportunity for Plaintiff to  
5 amend his complaint.

6 Additionally, Plaintiff has made amendments that he previously waived and are  
7 therefore improper. An amended complaint that "voluntarily" drops a defendant  
8 named in the original complaint effectively dismisses that defendant from the action.  
9 Similarly, a plaintiff waives all causes of action alleged in the original complaint that  
10 are "voluntarily" not alleged in the amended complaint. *Lacey v. Maricopa County*,  
11 693 F3d 896, 928 (9th Cir. 2012). For example, in Plaintiff's Third Amended  
12 Complaint, the second cause of action for Violation of the Unruh Civil Right Act was  
13 alleged against individual defendants and not PCL. Plaintiff's proposed Amended  
14 Third Amended Complaint now removes all the individual defendants and alleges this  
15 cause of action against PCL. This is improper.

16 **IV. CONCLUSION**

17 For the foregoing reasons, Defendants respectfully request that the Court deny  
18 Plaintiff's motion to amend his Third Amended Complaint.

19 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**

20 The undersigned party certifies that this brief contains 2359 words, which  
21 complies with the word limit of L.R. 11-6.1.

22  
23  
24  
25 ///

26 ///

27 ///

28 ///

DATED: September 30, 2024

HAIGHT BROWN & BONESTEEL LLP

By: /s/ Arezoo Jamshidi

Yvette Davis

Arezoo Jamshidi

Jeffrey Kirwin

Attorneys for Defendants THE GUILD

LAW SCHOOL DBA PEOPLE'S

COLLEGE OF LAW, JOSHUA

GILLENS, WILLIAM MAESTAS,

BOARD OF DIRECTORS FOR THE

PEOPLE'S COLLEGE OF LAW,

CHRISTINA MARIN GONZALEZ;

ROGER ARAMAYO; ISMAIL

VENEGAS; CLEMENTE FRANCO;

HECTOR PENA; PASCUAL TORRES;

CAROL DEUPREE; JESSICA

VIRAMONTES; AND JUAN SARINANA

Haight

**PROOF OF SERVICE**

Hill v. The Board of Directors, Officers, et al.

Case No. 2:23-cv-01298-JLS-CFM

**STATE OF CALIFORNIA, COUNTY OF SAN DIEGO**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is 402 West Broadway, Suite 1850, San Diego, California 92101.

On September 30, 2024, I served true copies of the following document(s) described as **DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO AMEND HIS THIRD AMENDED COMPLAINT; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATION OF AREZOO JAMSHIDI IN SUPPORT THEREOF** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on September 30, 2024, at San Diego, California.

/s/ Amy Craig

Amy Craig

**SERVICE LIST**  
**Hill v. The Board of Directors, Officers, et al.**  
**Case No. 2:23-cv-01298-JLS-CFM**

Todd R. G. Hill  
41459 Almond Avenue  
Quartz Hill, CA 93551

PRO SE

Email: [toddryangregoryhill@gmail.com](mailto:toddryangregoryhill@gmail.com)

Robert Ira Spiro  
Spiro Law Corp  
10573 West Pico Boulevard No 865  
Los Angeles, CA 90064

Attorney for Robert Ira Spiro

Email: [ira@spirolawcorp.com](mailto:ira@spirolawcorp.com)

Jean Roche Krasilnikoff  
The State Bar of California  
180 Howard Street  
San Francisco, CA 94105-1639

Attorney for Defendants Suzanne Celia  
Grandt, Vanessa Holton, et al.

Email: [Jean.Krasilnikoff@calbar.ca.gov](mailto:Jean.Krasilnikoff@calbar.ca.gov)

Haight